

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PAUL WILLIAMS-ISRAEL, Individually and
on behalf of all others similarly situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS, and
BELINDA NUCIFORA,

Defendants.

Case No.: 1:24-cv-07046-PK

Hon. Peggy Kuo

**DECLARATION OF ADAM M. APTON IN SUPPORT OF DEAN GIBBONS' MOTION
FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF COUNSEL**

I, Adam M. Apton, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner with the law firm Levi & Korsinsky, LLP (“Levi & Korsinsky”), counsel for lead plaintiff movant Dean Gibbons (“Movant”) and proposed Lead Counsel for the Class.

2. I submit this Declaration, together with the attached exhibits, in support of Movant’s motion for appointment as Lead Plaintiff and approval of his selection of Levi & Korsinsky as Lead Counsel for the Class.

3. Attached hereto as the exhibits are true and correct copies of the following:

Exhibit A: PSLRA Certification signed by Movant attesting to his transactions of Iris Energy Limited (“IREN”, “Iris Energy”, or the “Company”) securities;

Exhibit B: Loss Chart reflecting the losses incurred by Movant as a result of his transactions in IREN securities;

Exhibit C: Press Release published October 7, 2024, on *Business Wire*, announcing the pendency of the securities class action against defendants herein: *Williams-Israel v. Iris Energy Limited, et. al.*, Case No. 1:24-cv-07046-PK;

Exhibit D: Declaration signed by Movant in support of his lead plaintiff motion; and

Exhibit E: Firm Résumé of Levi & Korsinsky, proposed Lead Counsel for the Class.

I declare under penalty of perjury that the foregoing facts are true and correct.

Dated: December 6, 2024

Respectfully Submitted,

LEVI & KORSINSKY, LLP

By: /s/ Adam M. Apton

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*Lead Counsel for Dean Gibbons and
[Proposed] Lead Counsel for the Class*